Objection Deadline: August 3<sup>rd</sup>, 2021

## UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.1

PROMESA Title III

No. 17 BK 3283-LTS

Re: ECF No. 1063, 1150, 3269

(Jointly Administered)

SUMMARY OF TENTH APPLICATION OF MARINI PIETRANTONI MUÑIZ LLC FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY FOR THE PERIOD FROM FEBRUARY 1, 2021 THROUGH MAY 31, 2021

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

Name of Applicant:

to:

Authorized to Provide Professional Services

MARINI PIETRANTONI MUÑIZ, LLC

Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF") as the entity

authorized to act on behalf of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of Puerto Rico, the Public Building Authority, and the Puerto Rico Highways and Transportation Authority (the

"Debtors").

Period for which compensation and reimbursement are sought:

February 1, 2021, through May 31, 2021 (the "Compensation Period").

Total amount of compensation approved by interim order to date:

\$1,153,181.35 [ECF No. 14925]

Total amount of expenses approved by interim order to date:

\$17,299.73 [ECF No. 14925]

Amount of Compensation sought as actual, reasonable, and necessary:

\$380,863

Amount of Expense Reimbursement sought as actual, reasonable, and necessary:

\$5,054.48

Rates higher than those disclosed at retention:

MPM adjusted its hourly rates as of August 1, 2020.

Number of professionals included in this application:

10

This is a(n): \_\_monthly \_X interim \_\_final application<sup>2</sup>

This is the tenth interim fee application filed by Marini Pietrantoni Muñiz LLC in the Debtors' Title III Cases. The total time expended in connection with the preparation of this interim application is not included herein, as such time was expended after the Compensation Period.

<sup>&</sup>lt;sup>2</sup> MPM's fees and expense totals in this interim fee application do not differ from the sum previously served in MPM's monthly statements.

## **Prior Monthly Fee Statements Submitted:**

Compensation Period	Fees Incurred	Expenses
February 1, 2021- February 28, 2021	\$86,781.50	\$250
March 1, 2021- March 31, 2021	\$102,684.50	\$695.55
April 1, 2021- April 31, 2021	\$100,198	\$2,308.11
May 1, 2021- May 31, 2021	\$91,199	\$1,800.82
TOTAL INCURRED:	\$380,863	\$5,054.48

### **Payments Made to Date:**

Compensation Period	Fees Paid	Expenses Paid
February 1, 2021- February 28, 2021	\$78,103.35	\$250
March 1, 2021- March 31, 2021	\$91,687.05	\$695.55
TOTAL PAID:	\$169,790.40	\$945.55

### TABLE OF SCHEDULES AND EXHIBITS

Schedule A- List and Summary of Hours by Professional (February 1, 2021– May 31, 2021)

Schedule B - Summary of Hours and Compensation by Matter Code

<u>Schedule C</u> - Expense Summary

<u>Schedule D</u> - Customary and Comparable Disclosures

Exhibit A - Attorney Certification

Exhibit B- Detailed Time and Expense Records

### Schedule A

# LIST AND SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL (FEBRUARY 1, 2021– MAY 31, 2021)

Name	Title or Position	Hourly Rate <sup>3</sup> Billed in this Application	Hours Billed in this Application	Total Compensation
LUIS MARINI	MEMBER	\$300	240.80	\$72,240
CAROLINA VELAZ	MEMBER	\$250	358.50	\$89,625
VALERIE BLAY	ASSOCIATE	\$195	332.20	\$64,779
IGNACIO LABARCA	ASSOCIATE	\$225	18.50	\$4,162.50
IVAN GARAU	ASSOCIATE	\$225	491.40	\$110,565
LENY CACERES	ASSOCIATE	\$215	65.60	\$14,104
FRANK ROSADO	ASSOCIATE	\$170	10	\$1,700
ROSALIE IRIZARRY-SILVESTRINI	SPECIAL COUNSEL	\$265	7	\$1,855
MAURICIO MUNIZ	MEMBER	\$300	69.40	\$20,820
JUDITH VARGAS	PARALEGAL	\$135	7.50	\$1,012.50
TOTAL – February 1- May 31, 2021			1,600.90	\$380,863

<sup>&</sup>lt;sup>3</sup> Includes a 10% discount. Hourly rates were adjusted as of August 1, 2020. ECF. No. 14054.

#### LIST OF PROFESSIONALS WITH 15 HOURS OR LESS OF BILLABLE HOURS

Professional	Month (s) in which less than 15 hours were billed	Explanation why services were reasonable and
		necessary
Frank Rosado		Mr. Rosado is an associate who drafted and filed certain
Traine Rosado	April and May 2021	motions and worked on translations.
Rosalie Irizarry	March 2021	Mrs. Irizarry is a special counsel who worked on certain motions for the CW.
Judith Vargas	April 2021	Mrs. Vargas is a paraprofessional who worked on certain translations and gathered information.

# Schedule B SUMMARY OF HOURS AND COMPENSATION BY MATTER CODE

Task Code	Matter Description	Total Billed Hours	Total Fees Requested
	Title III Cases		
Plan and Disclosure Statement	This category relates to time spent by MPM attorneys related to Plan and Disclosure Statement.	15.10	\$4,205
Case Administration	This category includes all matters relating to general case administration and coordination, records maintenance, drafting, review, analysis and filing of pleadings, assisting the Debtors in fulfilling their duties as debtors in possession through AAFAF, and serves as a general code for services performed that do not fit under any other specific code.	825.90	\$204,389
Asset Analysis and Recovery	This category relates to the identification and review of potential assets including causes of action and non-litigation recoveries.	0.70	\$157.50
Claims Administration and Objections	This category includes all matters relating to the claims process in the Title III Case.	39.10	\$8,975
Fee Applications	This category relates to time spent by MPM attorneys in connection with the preparation of fee or retention applications, reviewing the fee applications of all other professionals, and assisting Treasury in the payment process.	329.90	\$64,971
Meetings and Communications with Creditors	This category includes all meetings and communications with attorneys for creditors.	1	\$300
Other Contested Matters	This category includes analysis, preparation, and prosecution of adversary proceedings or other litigation.	23.60	\$5,895
Relief From Stay and Adequate Protection	This category includes all matters relating to creditor requests for relief from the automatic stay or for adequate protection, including assisting the Debtors, through AAFAF, to respond, defend, and settle such requests.	57.10	\$14,167.50
Avoidance Actions	This category includes all matters relating to Avoidance Actions.	0.80	\$180

Task Code	Matter Description	Total Billed Hours	Total Fees Requested
	Other Matters/Adv. Pro	ceeding	
COOP Adversary Proceedings	This category includes all matters related to COOP Adversary Proceeding 18-00028.	9	\$2,167.50
PREPA	This category includes all matters related to the Puerto Rico Electric and Power Authority	36.30	\$9,085
Public Building Authority	This category relates to all matters related to Public Building Authority.	26.50	\$7,095
PRIDCO	This category relates to all matters related to PRIDCO.	30.50	\$7,867
PREPA- ADV. PROC.	This category includes all matters related to the Puerto Rico Electric and Power Authority Adversary Proceeding.	25.80	\$5,804
Dpt. Recreación y Deportes	This category includes all matters relating to <i>Dpt. Recreación y Deportes</i>	8.10	\$1,850
Public Corporation for the Supervision of Puerto Rico Cooperatives	This category includes all matters relating to the Public Corporation for the Supervision of Puerto Rico Cooperatives.	13.20	\$3,390
Puerto Rico Central Recovery and Reconstruction Office	This category includes all matters relating to Puerto Rico Central Recovery and Reconstruction Office.	46.40	\$11,810
Centro de Periodismo Investigativo, Inc.	This category includes all matters relating to <i>Centro de Periodismo Investigativo</i> , <i>Inc</i> .	111.90	\$28,554.50
	Grand Total	1,600.90	\$380,863

## Schedule C

### **EXPENSE SUMMARY**

	Total
Copying \$0.10 per copy	\$364.20
Delivery services/messenger	\$400
Online Research	\$520
Postage	\$216.46
Translation	\$2,691
Other	\$862.82
Grand Total	\$5,054.48

## Schedule D

Category of Timekeeper	Blended Hourly Rate	
	Billed This Case During the Compensation Period	
Member	\$273	
Associate/Attorney	\$213	

## UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO.

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.<sup>4</sup>

PROMESA Title III

No. 17 BK 3283-LTS

Re: ECF No. 1063, 1150, 3269

(Jointly Administered)

TENTH FEE APPLICATION OF MARINI PIETRANTONI MUÑIZ LLC FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY FOR THE PERIOD FROM FEBRUARY 1, 2021 THROUGH MAY 31, 2021

Marini Pietrantoni Muñiz LLC ("<u>MPM</u>"), as counsel to the Puerto Rico Fiscal Agency and Financial Advisory Authority ("<u>AAFAF</u>"), as the entity authorized to act on behalf of the Commonwealth of Puerto Rico, the Puerto Rico Sales Tax Financing Corporation, the Puerto Rico Highways and Transportation Authority, the Employees Retirement System of the Government of

<sup>.</sup> 

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); ); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority ("PBA") (collectively, the "Debtors"), pursuant to the authority granted to it under the Enabling Act of the Fiscal Agency and Financial Advisory Authority, Act 2-2017, makes its tenth interim application (this "Application") for allowance of compensation, under sections 316 and 317 of PROMESA, Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the District of Puerto Rico and the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses by Attorneys in Larger Chapter 11 Cases, effective, November 1, 2013, of \$380,863 and reimbursement of expenses of \$5,054.48, for the period of from February 1, 2021, through May 31, 2021 (the "Compensation Period") in accordance with the Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [ECF No. 3269] (the "Interim Compensation Order"), the Memorandum regarding Fee Review-Timeline and Process, dated November 10, 2017 (the "Fee Examiner Guidelines"), the Order on Fee Examiner's Motion to Impose Presumptive Standards and Timeliness Requirements for Professional Fee Applications [ECF No. 3932] (the "Presumptive Fee Standards Order"), and the second Memorandum regarding Fee Review-Timeline and Process, dated March 30, 2020 (the "Fee Examiner Guidelines II"). In support of this Application, MPM respectfully states as follows:

#### **BACKGROUND**

1. On May 3, 2017, the Commonwealth of Puerto Rico (the "Commonwealth"), by and through the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as the Commonwealth's representative pursuant to section 315(b) of PROMESA, filed a petition with the Court under Title III of PROMESA.

- 2. On May 5, 2017, the Puerto Rico Sales Tax Financing Corporation ("<u>COFINA</u>"), by and through the Oversight Board, as COFINA's representative pursuant to PROMESA section 315(b), filed a petition with the Court under Title III of PROMESA.
- 3. On May 21, 2017, the Puerto Rico Highways and Transportation Authority ("HTA"), by and through the Oversight Board, as HTA's representative pursuant to PROMESA section 315(b) filed a petition with the Court under Title III of PROMESA.
- 4. On May 21, 2017, the Employees Retirement System for the Commonwealth of Puerto Rico ("ERS"), by and through the Oversight Board, as ERS's representative pursuant to PROMESA section 315(b) filed a petition with the Court under Title III of PROMESA.
- 5. On July 3, 2017, the Puerto Rico Electric Power Authority ("<u>PREPA</u>") by and through the Oversight Board, as PREPA's representative pursuant to PROMESA section 315(b) filed a petition with the Court under Title III of PROMESA.
- 6. On September 27, 2019, the Puerto Rico Buildings Authority ("PBA"), by and through the Oversight Board, as PBA's representative pursuant to PROMESA section 315(b), filed a petition with the Court under Title III of PROMESA.
- 7. Through Orders of this Court, the Commonwealth, COFINA, HTA, ERS, and PREPA Title III Cases (together, the "<u>Title III Cases</u>") are jointly administered for procedural purposes only, pursuant to PROMESA section 304(g) and Bankruptcy Rule 1015 [ECF Nos. 242,537,1417].
- 8. This Application seeks allowance of compensation and reimbursement of expenses incurred by MPM in connection with the Title III Cases matters described below.

#### **COMPENSATION REQUESTED BY MPM**

- 9. AAFAF retained MPM pursuant to an engagement letter dated February 20, 2018, as subsequently amended, (the "Engagement Letter"). Pursuant to the Engagement Letter, payment of all fees and expenses detailed in this Application will be made exclusively by AAFAF.
- 10. MPM's hourly rates are set at a level designated to compensate MPM fairly for the work of its attorneys and paraprofessionals and are disclosed in detail in the Engagement Letter. In light of the unique facts and circumstances of these Title III Cases, MPM agreed to provide a 10% discount on all fees incurred.
- 11. MPM's rates are appropriate and reasonable for complex litigation and restructuring matters, whether in court or otherwise. The rates and rate structure reflect that such complex matters typically involve great complexity, high stakes, and intense time pressures. In addition, the fees charged by MPM are in accordance with the firm's existing billing rates and procedures in effect during the Compensation Period. The rates charged by MPM for the services rendered by its professionals are consistent with the competitive market rates in Puerto Rico for bankruptcy matters charged by other Puerto Rico attorneys who have appeared in the Title III cases.
- 12. MPM submits that the compensation requested is reasonable in light of the nature, extent, and value of such services provided to AAFAF.

#### **SUMMARY OF SERVICES**

13. During the Compensation Period, MPM provided important professional services to AAFAF in connection with the Title III Cases. Detailed descriptions of the specific services provided, and the time expended performing such services are attached as **Exhibit B**, and a

summary of the services provided by MPM to AAFAF during the Compensation Period is set forth below.

- 14. MPM has served as counsel to AAFAF, who as the entity authorized to act on behalf of the Debtors pursuant to the authority granted to it under the Enabling Act of the Fiscal Agency and Financial Advisory Authority, Act 2-2017, has defended the Debtors' rights and interests in the multiple contested matters and adversary proceedings, and in the formulation of legal strategies related to the response to requests to modify the Title III stay, the claims resolution procedure, the assumption and rejection of unexpired executory leases, among other matters.
- During the Compensation Period, MPM has worked in, among other matters, the following: (i) the drafting and revision of motions and pleadings; (ii) preparation for hearings, (iii) preparing and delivering to the Court AAFAF's status reports during the omnibus hearings held during the Compensation Period; (iv) communicated with various agencies and assisted in the negotiation and drafting of stipulations or objections to requests to modify the Title III stay; (v) research of Puerto Rico and federal law regarding bankruptcy issues; (vi) analysis of claims asserted against the Debtors and negotiated resolutions of such claims or litigated them as part of the Title III Proceedings; (vii) analysis of and assisted in negotiating and resolving insurance related claims; (viii) analysis of claims and participate in claim resolution process; (ix) representation in numerous adversary proceedings and appeals relating to the Title III Cases; (x) assisting all professionals and the Treasury Department in the payment process to ensure compliance with the court order; and (xi) performed other services as described in this Application.
- 16. MPM attorneys, as counsel for AAFAF, also attended hearings and participated in teleconferences with AAFAF, its professionals, the Oversight Board, its professionals, creditors,

and other parties. More than one MPM attorney may have participated in these hearings and conferences, when required, in order to better represent AAFAF.

17. MPM has established subject matters categories (each, a "Matter Category") for keeping time records of the work performed for AAFAF. The following is a summary by Matter Category, of the professional services provided by MPM during the Compensation Period<sup>5</sup>.

#### a) Case Administration- 825.90- \$204,389

18. This category includes all matters relating to general case administration and coordination, record maintenance, pleading and motion review and analysis, and assisting the Debtors, through AAFAF, in fulfilling their duties as debtors in possession, attending and preparing for omnibus hearings, and serves as a general code for services performed that do not fit under any other specific code. For example, the firm represents AAFAF in numerous adversary proceedings, state court litigation, and contested matters involving the Commonwealth.

#### b) Fee Applications -329.90- \$64,971

19. This category relates to time spent by MPM attorneys in connection with the analysis and objection to fee statements of other professionals. During the Compensation Period, MPM assisted other professionals with doubts related to the tax amendments altering withholding for Mainland professionals as well as with issue relating to the government contribution imposed. MPM attorneys also assisted the Department of Treasury in the review of all professionals' monthly fee statements and processing of payment of all professional fees. Additionally, MPM spent time preparing its monthly fee statements for the months of January through April 2021, and its Ninth Interim Fee Application. MPM reviews and analyzes the monthly fee statements and

<sup>&</sup>lt;sup>5</sup> Several of the matter categories, do not appear in this summary because MPM did not bill a substantial amount of time under those categories during the Compensation Period. **Exhibit B** provides a complete summary of the hours billed, and total compensation requested by matter category.

interim applications for all professionals in the Title III cases, and coordinates with Treasury the payment of such fees.

#### c) Centro de Periodismo Investigativo, Inc. – 111.90 - \$28,554.50

20. This category includes all matters relating to the requests regarding *Centro de Periodismo Investigativo, Inc.'s* mandamus filed for the disclosure of certain documents and communications. MPM worked on extensive research, strategy discussion, and drafting of multiple motions including two motions for reconsideration filed before the Commonwealth of Puerto Rico, Court of First Instance and the Commonwealth of Puerto Rico, Court of Appeals, two certioraris filed at the Commonwealth of Puerto Rico, Court of Appeals, and the Supreme Court of Puerto Rico, as well as Motion for Stay pending appeal in bankruptcy court, among others.

#### d) Relief from Stay and Adequate Protection- 57.10- \$14,167.50

21. This category includes all matters relating to requests for relief from the automatic stay or for adequate protection, including assisting the Debtors to respond, defend, and settle such requests. During the Compensation Period, MPM analyzed the applicability of the automatic stay to pending federal and state litigation against all Debtors, responded to requests to lift the Title III Stay, consulted with the Debtors and various Commonwealth agencies, and drafted and revised objections or stipulations related to the requests.

#### **ATTORNEY CERTIFICATION**

22. In accordance with Puerto Rico Local Bankruptcy Rule 2016-1(a)(4), the undersigned has reviewed the requirements of Puerto Rico Local Bankruptcy Rule 2016-1(a)(4) and certifies to the best of his information, knowledge, and belief that this Application complies with Puerto Rico Local Bankruptcy Rule 2016-1(a)(4). In this regard, and incorporated herein by

reference, the Certification of Luis C. Marini Biaggi in accordance with the U.S. Trustee Guidelines is attached hereto as **Exhibit A**.

#### **NO PRIOR APPLICATION FILED**

23. No prior application for the relief requested by this Application has been made to this or any other court.

#### **RESERVATION OF RIGHTS**

24. MPM reserves the right to request compensation for services and reimbursement of such expenses in a future application that have not been included in relation to the Compensation Period object of this Application.

WHEREFORE, MPM respectfully requests that the Court enter an order: (a) awarding MPM compensation for professional and paraprofessional services provided during the Compensation Period in the amount of \$380,863; (b) reimbursement of actual, reasonable, and necessary expenses incurred in the Compensation Period in the amount of \$5,054.48; and (c) granting such other relief as is appropriate under the circumstances.

Dated: July 15, 2021

San Juan, Puerto Rico

Respectfully submitted,

M | P | M MARINI PIETRANTONI MUÑIZ LLC

Attorneys for The Puerto Rico Fiscal Agency and Financial Advisory Authority 250 Ponce De León Ave.
Suite 900

San Juan, PR 00918

Tel.: (787) 705-2171

s/Luis C. Marini-Biaggi Luis C. Marini-Biaggi USDC No. 222301 lmarini@mpmlawpr.com <u>s/ Carolina Velaz-Rivero</u>Carolina Velaz-RiveroUSDC No. 300913cvelaz@mpmlawpr.com

s/Valerie M. Blay-Soler Valerie M. Blay-Soler USDC No. 305511 vblay@mpmlawpr.com

## Exhibit A

ATTORNEY CERTIFICATION

## UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO.

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al

Debtors.6

PROMESA Title III

No. 17 BK 3283-LTS

Re: ECF No. 1063, 1150, 3269

(Jointly Administered)

## CERTIFICATION OF LUIS C. MARINI BIAGGI PURSUANT TO PUERTO RICO LOCAL BANKRUPTCY RULE 2016-1(a)(4)

Luis C. Marini Biaggi, under penalty of perjury certifies as follows:

- 1. I am a member with the law firm Marini Pietrantoni Muñiz LLC ("MPM"). I make this certification in accordance with Rule 2016-1(a)(4) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Puerto Rico (the "Local Rules") regarding the contents of applications for compensation and expenses.
- 2. I am familiar with the work performed by MPM for the Puerto Rico Fiscal Agency and Financial Advisory Authority ("<u>AAFAF</u>") acting for or on behalf of the Debtors.

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); ); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

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3. I have read the Tenth Interim Application of Marini Pietrantoni Muñiz LLC for Allowance

of Compensation for Services Rendered and for Reimbursement of Expenses As Counsel to the

Puerto Rico Fiscal Agency and Financial Advisory Authority for the Period From February 1,

2021 through May 31, 2021 (the "Application"), and the facts set forth therein are true and correct

to the best of my knowledge, information, and belief.

4. To the best of my knowledge, information, and belief, formed after reasonable inquiry,

the fees and disbursements sought in the Application are permissible under PROMESA, the

Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Interim Compensation Order,

the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses by

Attorneys in Larger Chapter 11 Cases, effective, November 1, 2013 (the "Guidelines"), and the

Local Rules.

Dated: July 15, 2021

/s/Luis C. Marini-Biaggi